

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ELIZABETH M. MAYS,

Plaintiff,

v.

Case No. 14-CV-396

4 MILE, INC.,
AMBROSE T. SCHWARTZ,
DIANE M. SCHWARTZ,
SYLVESTER WEAVER, and
PAMELA WEAVER,

Defendants.

**DECLARATION OF ELIZABETH M. MAYS IN RESPONSE TO SUMMARY
JUDGMENT MOTION AS TO SYLVESTER WEAVER**

I, Elizabeth M. Mays, do declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. That I am the plaintiff and class representative in this action.
2. During the course of my employment as a dancer at 4 Mile, Inc., the defendants repeatedly made it clear to me and other dancers that Sylvester Weaver, Pamela Weaver, Ambrose T. Schwartz (“A.J.”) and Diane M. Schwartz collectively own 4 Mile, Inc.
3. That the original owner was Ambrose Schwartz Sr., who is the father of AJ and Pamela Weaver.
4. During the course of my employment with the defendants, I also learned that Sylvester Weaver, Pamela Weaver, A.J. and Diane M. Schwartz collectively own the real estate upon which 4 Mile, Inc. operates.

5. Furthermore, it is common knowledge among the dancers that the defendants are related to each other: Sylvester Weaver and Pamela Weaver are husband and wife; A.J. and Diane M. Schwartz are husband and wife; and A.J. and Pamela Weaver are brother and sister.

6. At various times throughout my employment, I have heard the defendants or their agents tell patrons of the 4 Mile, Inc. that any receipts from their purchases or ATM withdrawals would show the name "S.A. Controls" rather than "4 Mile, Inc."

CERTIFICATION

I, Elizabeth M. Mays, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing statements contained in paragraphs 1-6 above are true and correct to the best of my knowledge.

I have executed this Declaration on September 3, 2014.

Signed,

/s/ Elizabeth M. Mays

Elizabeth M. Mays